

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WAYNE WELMON, Individually and on Behalf of
all others similarly situated,

Plaintiff,

vs.

CHICAGO BRIDGE & IRON CO. N.V.,
GERALD M. GLENN, ROBERT B. JORDAN, and
RICHARD E. GOODRICH,

Defendants.

Case No. 06-CV-01283 (JES)

ELECTRONICALLY FILED

**NOTICE OF MOTION FOR FINAL APPROVAL
OF SETTLEMENT AND PLAN OF ALLOCATION
OF SETTLEMENT PROCEEDS**

To: All Counsel:

PLEASE TAKE NOTICE, that upon the accompanying Joint Declaration of Robert M. Roseman, Mark S. Willis, and Barry A. Weprin in Support of Plaintiffs' Motion for Final Approval of Settlement and Plan of Allocation of Settlement Proceeds and Plaintiffs' Motion for Award of Attorneys' Fees and Reimbursement of Expenses, dated May 28, 2008, and the exhibits thereto; the accompanying Plaintiffs' Memorandum in Support of Their Motion for Final Approval of Settlement and Plan of Allocation of Settlement Proceeds; and all prior papers and proceedings herein, Lead Plaintiffs Fortis Investment Management N.A./S.A. and Metzler Investment GmbH and proposed Settlement Class Representative Walter J. Mundy, hereby move this Court, pursuant to Rule 23 of the Federal Rules of Civil Procedure, for an order: (i) granting final approval of the settlement of this litigation and dismissing it against Defendants with prejudice; and (ii) approving the Plan of Allocation of Settlement Proceeds.

Dated: May 28, 2008

Respectfully submitted,

**SPECTOR ROSEMAN & KODROFF,
P.C.**

/s/ Robert M. Roseman

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